

KML LAW GROUP, P.C.
A Professional Corporation incorporated in Pennsylvania
701 Market Street, Suite 5000
Philadelphia, PA 19106
(215) 627-1322
Attorneys for MidFirst Bank

IN THE MATTER OF:

Michael S Fisher

DEBTOR(S),

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 13
CASE NO. 18-34110 MBK

**NOTICE OF MOTION FOR RELIEF
FROM STAY**

TO:

Michael S. Fisher
79 Broad Avenue
Trenton, NJ 08618

Standing Chapter 13 Trustee
CN 4853
Trenton, NJ 08650-4853

Law Offices of Scott E. Kaplan, LLC
5 South Main Street, PO Box 157
Allentown, NJ 08501

US TRUSTEE
Office of the US Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

Albert Russo

PLEASE TAKE NOTICE THAT the undersigned attorney for **MidFirst Bank**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **U. S. Courthouse, 402 East State Street; Trenton, NJ**, for an Order to Grant Relief from the Automatic Stay to authorize the moving parties to prosecute a foreclosure action for the reason that the debtors have failed to maintain their monthly mortgage payments to the Secured Creditor as more particularly set forth in the certification submitted herewith. Costs and counsel fees will also be requested. The property involved is known as **79 Broad Avenue, Ewing NJ 08618**. The hearing on this matter is scheduled for **May 24, 2023 at 9:00 AM**

Dated: May 04, 2023

/s/Denise Carlon
Denise Carlon, Esquire
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